UNITED STATED BANKRUPTCY COURT DISTRICT OF MINNESOTA

In Re: Omer, Tasha M. BKY: 04-32466

Debtor(s) Chapter 13 Case

DEBTOR(S) RESPONSE TO TRUSTEE'S MOTION TO DISMISS

- 1. The Chapter 13 Trustee has moved for the dismissal of the above referenced Chapter 13 Plan (the Plan).
- 2. Debtor fell behind due to a death in the family and other family problems. Debtor wishes to complete the plan. Arrears under the Plan total \$600, including the August 2004 payment.
- 3. Debtor(s) propose to resume regular monthly payments beginning September, 2004. Debtor(s) also propose to cure the arrears to the Plan by making additional payment to the Trustee each month for two months in the amount of \$400 on September 10, 2004 and \$200 on September 24, 2004.

WHEREFORE, the Debtor(s) respectfully request(s) that the Court deny the Trustee's motion for dismissal.

Dated: September 8, 2004 By: Curtis K. Walker Law Firm

/e/ Curtis K. Walker Curtis K. Walker #113906 Thayer A.K. Butler #200815 Mary C. Hoben #335411 4356 Nicollet Avenue South Minneapolis, MN 55409 (612) 824-4357

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UNSWORN CERTIFICATE OF SERVICE

I, Rebecca Johnson, declare under penalty of perjury that on September 8, 2004, I mailed copies of the foregoing Debtor(s) Response to Trustee's Motion to Dismiss by first class mail, postage prepaid, to each entity named below at the address stated for each entity:

United States Trustee 1015 U.S. Courthouse 300 South 4th Street Minneapolis, MN 55415

Jasmine Z. Keller Trustee In Bankruptcy 310 Plymouth Building Minneapolis, MN 55402

Executed on: September 8, 2004 /e/ Rebecca H. Johnson